

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

**OHIOANS AGAINST
CORPORATE BAILOUTS, LLC, *et al*,**

Plaintiffs,

v.

FRANK LAROSE, *et al*,

Defendants.

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Case No. 2:19-CV-4466

Judge Sargus

DECLARATION OF YALANDRA HAMPTON

Pursuant to 28 U.S.C. § 1746, I, **YALANDRA HAMPTON**, hereby declare as follows:

1. I am over 18 years of age and have personal knowledge of the facts stated herein.
2. Currently, I am involved in the effort in Ohio to circulate petitions in order to subject portions of H.B. 6 to referendum.
3. Prior to engaging in any such efforts, I completed an Ohio Secretary of State Form 15.
4. On the Form 15, I disclosed not only my name but my cell phone number.
5. Although I included my given name, Yalandra, on the Form 15, people I am familiar with, including most of the people with whom I have been working on the petition drive, do not refer to me as Yalandra, they refer to me using my nickname “YoYo”. Thus, the only reasonable place that anybody would get my cell phone number and my given name of Yalandra would be from the Form 15.

6. On October 9, 2019, I received an unsolicited text message on my cell phone from the phone number indicated as (252) 404-2197 and the person identifying himself as Marcus with Ohioans for Energy Security.

7. I briefly engaged in a text exchange on my phone with the person identifying himself as Marcus.

8. A true and accurate copy of the text exchange taken by a screen shot of my phone follows:



9. Marcus called me and, during that telephone call, he offered to give me \$2,500 and a plane ticket home to stop gathering signatures for the petition, if I would return to my home state

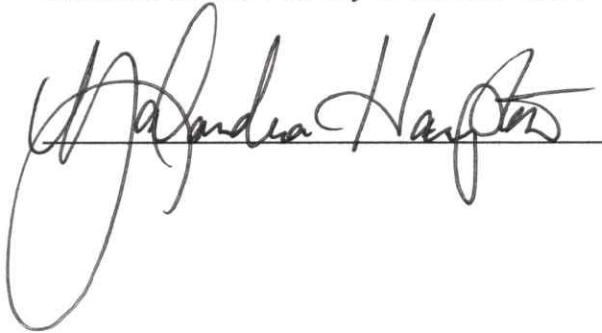
of Tennessee. Marcus stated that the \$2,500 would be paid in two payments: half immediately, and the remaining half would be wired to me upon my return home.

10. Marcus said that he would fax me a contract to sign, and that I would need to complete a W-9.

11. I ended the call by telling Marcus I would consider his offer. Ultimately, I rejected the offer before he sent me any contract.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of October 2019.

A handwritten signature in black ink, appearing to read "Patricia Hays", is written over a horizontal line. The signature is stylized with large, flowing loops.